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Assignee: Dell Products L.P.
Title: Combination Personal Data Assistant and Personal Computing System
Dynamic Memory Reclamation
Serial No.: 09/770,162 Filing Date: January 26, 2003
Examiner: Eugene Yun Group Art Unit: 2682
Docket No.: DC-02758 Customer No.: 33438

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**PRE-APPEAL BRIEF REQUEST FOR REVIEW
AND STATEMENT OF REASONS**

Sir:

Applicant requests review of the Final Rejection in the above-identified application. No amendments are being filed with the request. This request is being filed with a Notice of Appeal. The following sets forth a succinct, concise, and focused set of arguments for which the review is being requested.

CLAIM STATUS

Claims 1 – 27 are pending in the application. Claims 1 – 27 stand rejected under Mousseau, U.S. Patent No. 6,779,019 (Mousseau) in view of Sagar, U.S. Patent No. 6,873,841 (Sagar).

REMARKS

The following remarks provide applicants' position regarding how the claims distinguish over the art of record. While not discussed herein, all the arguments presented regarding hindsight reconstruction and suggestion to combine are maintained.

The present invention generally relates to an architecture which includes a PC system and a PDA system which independently have access to a communication device, thereby allowing either system to communicate and receive messages regardless of the active state of the other system. Figure 4 shows an

example of one such system in which the southbridge controller 110 of the PC and the PDA companion 205 of the PDA are coupled to a communication device 400.

More specifically, the present invention, as set forth by independent claim 1, relates to a mobile computing system. The system includes a common communication device, a personal computing system (PC) coupled to the common communication device, a PDA coupled to the common communication device. The PC includes a storage device capable of receiving and storing messages from the common communication device and a personal digital assistant system (PDA). The PDA includes a storage device capable of receiving and storing messages from the common communication device. The storage device of the PC synchronizes messages received from the common communication device with the storage device of the PDA. The PC and the PDA are capable of controlling the common communication device, but one of the PC and the PDA controlling the common-communication device at a given time.

The present invention, as set forth by independent claim 8, relates to a mobile computing system. The system includes a common communication device, a personal computing system (PC) coupled to the common communication device, the PC capable of receiving messages through the common communication device and a personal digital assistant system (PDA) coupled to the common communication device. The PDA is capable of receiving messages through the common communication device and synchronizing the messages received through the common communications device with the PC. The PC and the PDA are capable of controlling the common communication device, but one of the PC and the PDA controlling the common-communication device at a given time.

The present invention, as set forth by independent claim 12, relates to a method of clearing and archiving messages in a dual system computer architecture which includes a first computer system coupled to a common communication device and a second computer system coupled to a common communication device. The first computer system and the second computer system are capable of controlling the common communication device with one of the first computer system and the second computer system controlling the common communication device at a given time. The method includes receiving and storing messages by the first computer system to a first memory device, synchronizing the messages with the second computer system, whereby the second computer system archives synchronized messages to a second memory device, and deleting synchronized and archived messages whenever the first memory device is filled.

The present invention, as set forth by independent claim 16, relates to a method of clearing and archiving messages in a dual system computer architecture which includes a first computer system coupled to a common communication device and a second computer system coupled to a common communication device. The first computer system and the second computer system are capable of

controlling the common communication device with one of the first computer system and the second computer system controlling the common communication device at a given time. The method includes receiving and storing messages by a first computer system to a first memory device, synchronizing the messages with a second computer system, whereby the second computer system archives synchronized messages to a second memory device, and informing a user whenever the first memory device is filled.

Mousseau disclose pushing user-selected data items from a host system to a user's mobile communication device upon detecting the occurrence of one or more user-defined event triggers is provided. The user may then move the data items to a particular folder within a folder hierarchy stored in the mobile data communication device, or may execute some other system operation on the data item. Software operating at the mobile computer and the host system then synchronizes the folder hierarchy of the mobile device with a folder hierarchy of the host system, and any actions executed on the data items at the mobile device are then automatically replicated on the same data items stored at the host system.

More specifically, Mousseau discloses a host system 10 that is connected to a local area network 14. The local area network 14 is in turn connected to a wide area network 18. Mousseau further discloses that the mobile communication device 24 is also coupled to the wide area network 18 via a wireless gateway 20. The mobile data communication device 24 includes software that works with the redirector program 12 to enable redirection of user selected data items. (See generally, Mousseau, Col. 9, line 46 – col. 10, line 39.)

Sagar discloses a shared address-data service for personal CE equipment where a user is enabled to upload to a server on the Internet, information from a contact database in a communications apparatus. The server manipulates the uploaded information and extracts or converts the format of the records for a second contact database of a second communications apparatus.

When discussing Sagar, the Examiner sets forth:

Sagar teaches the PC and the PDA (see 102 and 104 of fig. 1 also noting col. 2, lines 10 – 13) capable of controlling the common communication device 106 (fig. 1), but one of the PC and PCA controlling the common communication device at a given time (see col. 1, lines 58-67 and col. 2, lines 1-4 noting the one-way transfer of information between the first and second apparatus and vice versa). Therefore, it would have been obvious to one of ordinary skill in the art at the time the invention was made to provide to teachings of Sagar to said device of Mousseau in order to provide convenience in data sharing between mobile and wireless devices (Final Office action dated May 20, 2005, pages 2,3.)

The portion of Sagar to which the Examiner refers sets forth:

The information is for operational use of both first and second apparatus. According to the method the information is uploaded from the first apparatus to a server, preferably via the Internet. The uploaded information is manipulated at the server. The manipulation comprises,

for example, filtering and format conversion. The manipulated information is downloaded from the server, e.g., via the Internet, to the second apparatus for storage in a second data base of the second apparatus. *Preferably, the first apparatus has a first communications capability and the second apparatus has a second communications capability. For example, the first apparatus comprises a PDA with an email capability or a pager, and the second apparatus comprises a mobile phone or a wired phone.* The first and second data bases relate to first and second communications directories, with, e.g., names of persons, their dates of birth, their telephone and fax numbers, their street addresses, their email addresses, etc. In another example, the first and second apparatus comprises first and second PDA's or first and second mobile phones that use such contact data bases of different formats (Sagar col. 1, line 60 – col. 2, line 13, emphasis added).

The device that the examiner is referring to as a “common communication device 106” is discussed within Sagar as server 106. When discussing this server, Sagar sets forth:

A web browser 116 or e-mail application is also provided on PDA 102. When the user connects to the Internet 112 a background process 118 (which is referred to herein as the "uploader") detects that the connection is made. *Once the connection to the Internet 112 exists uploader 118 connects to a predetermined Internet site of server 106.* Once connected to the site, uploader 118 sends a copy of database file 108 into storage on server 106 by standard Internet protocols (HTTP POST) (Sagar, col. 5, lines 1 – 9, emphasis added).

The server of Sagar is not a common communication device which is coupled between a PC and a PDA as claimed, but the actual recipient of data provided by the PDA 102. The analogy to a communication device as claimed would be the modem 1114 of Sagar or perhaps the mobile phone 104. However, within Sagar, each PDA 102 would include a respective modem.

Accordingly, Mousseau and Sagar do not teach or suggest a mobile computing system which includes a common communication device, a personal computing system (PC) coupled to the common communication device, a PDA coupled to the communication device, where *the storage device of the PC synchronizes messages received from the common communication device with the storage device of the PDA*, and *where the PC and the PDA are capable of controlling the common communication device*, but *one of the PC and the PDA controlling the common-communication device at a given time*, all as required by independent claim 1. Accordingly, claim 1 is allowable over Mousseau and Sagar. Claims 2 – 7 depend from claim 1 and are allowable for at least this reason.

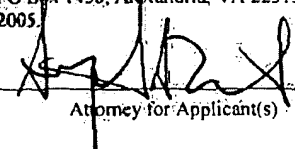
Mousseau and Sagar do not teach or suggest a mobile computing system which includes a common communication device, a personal computing system (PC) coupled to the common communication device, and a personal digital assistant system (PDA) coupled to the common communication device where *the PDA is capable of receiving messages through the common communication device and synchronizing the messages received through the common communications device with the PC* and *where the PC and the PDA are capable of controlling the common communication device*, but *one of the PC and the PDA controlling the common-communication device at*

a given time, all as required by independent claim 8. Accordingly, claim 8 is allowable over Mousseau and Sagar. Claims 9 – 11 depend from claim 8 and are allowable for at least this reason.


Mousseau and Sagar do not teach or suggest a method of clearing and archiving messages in a dual system computer architecture which includes a first computer system coupled to a common communication device and a second computer system coupled to a common communication device, the first computer system and the second computer system are capable of controlling the common communication device with one of the first computer system and the second computer system controlling the common communication device at a given time, much less such a method which includes receiving and storing messages by the first computer system to a first memory device, synchronizing the messages with the second computer system, whereby the second computer system archives synchronized messages to a second memory device, and deleting synchronized and archived messages whenever the first memory device is filled, all as required by independent claim 12. Accordingly, claim 12 is allowable over Mousseau and Sagar. Claims 13 – 15 depend from claim 12 and are allowable for at least this reason.

Mousseau and Sagar do not teach or suggest a method of clearing and archiving messages in a dual system computer architecture which includes a first computer system coupled to a common communication device and a second computer system coupled to the common communication device, the first computer system and the second computer system are capable of controlling the common communication device with one of the first computer system and the second computer system controlling the common communication device at a given time, much less such a method which includes receiving and storing messages by the first computer system to a first memory device, synchronizing the messages with a second computer system, whereby the second computer system archives synchronized messages to a second memory device, and informing a user whenever the first memory device is filled, all as required by independent claim 16. Accordingly, claim 16 is allowable over Mousseau and Sagar. Claims 17 – 27 depend from claim 16 and are allowable for at least this reason.

In view of the arguments set forth herein, the application is believed to be in condition for allowance and a notice to that effect is solicited. Nonetheless, should any issues remain that might be subject to resolution through a telephonic interview, please telephone the undersigned.

I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail in an envelope addressed to: COMMISSIONER FOR PATENTS, PO Box 1450, Alexandria, VA 22313-1450, on September 20, 2005.	
 Attorney for Applicant(s)	9/20/05 Date of Signature

Respectfully submitted,


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